

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )

)

v. )

Docket No. 19-cr-40024

)

JUNIOR MELENDEZ, )

Defendant )

ASSENTED TO MOTION TO CONTINUE SENTENCING

The defendant respectfully moves this Honorable Court to continue the sentencing hearing presently scheduled for September 28, 2022 for sixty days.

As grounds therefore, counsel states:

1. Counsel is scheduled to begin state court trials on August 8, 2022 (home invasion et al); September 20, 2022 (murder); and will be on vacation the end of August.
2. Counsel needs additional time to move to vacate a state criminal conviction that would impact the defendant's criminal history
3. Counsel needs additional time to respond to the 851 portions of the indictment in Docket 19-cr-40025.
4. Counsel moved to consolidate sentencing of Docket No. 19-cr-40024 and 19-cr-40025.
5. AUSA Friedholm and Probation Officer D'Adiecco assent to this continuance.

Respectfully submitted,  
Junior Melendez  
By his attorney,

/s/ Joan M. Fund  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Joan M. Fund

Joan M. Fund, Esquire

Date: August 4, 2022